## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

UNITED STATES OF AMERICA,

v. CRIMINAL NO.: 2:11cr33

MOHAMMAD SAAILI SHIBIN,

Defendant.

## <u>DEFENDANT 'S STIPULATION WITH</u> RESPECT TO SENTENCING FACTORS

COMES NOW the defendant, Mohammad Saaili Shibin, by counsel, and respectfully stipulates that the Sentencing Factors and Guideline calculations as proposed in the Presentence Report are accurate, and the defendant therefore offers no objections to those proposed factors or calculations.

MOHAMMAD SAAILI SHIBIN By Counsel

/s/

James O. Broccoletti, Esquire VSB# 17869 Counsel for Mohammad Saaili Shibin ZOBY & BROCCOLETTI, P.C. 6663 Stoney Point South Norfolk, VA 23502 (757) 466-0750 (757) 466-5026 james@zobybroccoletti.com

## CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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I hereby certify that on the 6th day of August, 2012, I caused a true and correct copy of the foregoing to be mailed to the following non-filing user:

Darryl A. Upshur, U. S. Probation Officer 600 Granby Street Suite 200 Norfolk, VA 23510

/s/

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